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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

NIPPONKOA INSURANCE CO. LTD

Plaintiff,

-against- : Case No.: 1:08-cv-06224-RMB

X

FRONTLINE CARRIER SYSTEMS, INC. AND PRO RISING INT'L, LTD.,

Defendants.

: ----- x

ANSWER OF DEFENDANT PRO RISING INTERNATIONAL, LTD. TO CROSS-CLAIMS OF DEFENDANT FRONTLINE CARRIER SYSTEMS, INC.

Now comes the Defendant, PRO RISING INTERNATIONAL, LTD. (hereinafter "Pro Rising"), and hereby responds to the individually numbered paragraphs of the cross-claims of Co-Defendant Frontline Carrier Systems, Inc. (hereinafter "Frontline") Answer with Counterclaims and Cross-Claims (hereinafter "Cross-Claims") as follows:

AS FOR THE FIRST CROSS-CLAIM

1. The allegations contained in Paragraph 52 of the Cross-Claim refer to Frontline's Answer and Affirmative Defenses to plaintiff's Complaint and therefore do not require a

response from Pro Rising.

2. Pro Rising denies the allegations contained in Paragraph 53 of Frontline's Cross-

Claims.

AND AS FOR THE SECOND CROSS-CLAIM

3. Pro Rising incorporates herein by reference allegations contained in Paragraph 1-

2 inclusive above and all the responses below.

5. Pro Rising refers to the responses contained in Paragraphs 1-3 inclusive above for

its response to Paragraphs 54 of Frontline's Cross-Claims.

4. Pro Rising denies the allegations contained in Paragraph 55 of Frontline's Cross-

Claims.

WHEREFORE, Defendant Pro Rising International, Ltd., respectfully demands

judgment dismissing Frontline Carrier Systems, Inc.'s Cross-Claims with prejudice in its

entirety, together with costs and disbursement of defending the within action and other relief as

this Honorable Court deems just and proper.

Dated:

Stamford, Connecticut

September 4, 2008

Respectfully submitted,

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

By:

Brian Del Gatto (BD7759)

CERTIFICATE OF SERVICE

I certify under penalty of perjury, pursuant to 28 U.S.C. 1746, that the following is true and correct; that on September 4, 2008, I caused to be served, via the Electronic Case Filing system and regular mail, a copy of the foregoing upon the following counsels of record:

TO: David T. Maloof
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